

January 15, 2021

The Honorable Joy Hofmeister, State Superintendent of Public Instruction  
Honorable Members, State Board of Education  
Oklahoma State Department of Education  
2500 N. Lincoln Blvd., Suite 121  
Oklahoma City, OK 73105

Dear Superintendent Hofmeister and State Board Members:

After evaluating the Executive Summary and Redlined Amendment documents detailing proposed changes to Oklahoma EDGE, the state's strategic plan for compliance with ESSA's federal mandates, following is my response to the request for public comment.

1. Based on my experience with these measures over the last 30 years, I want to commend your team for making the subgroup performance and proficiency rates equal weights in the state accountability system. The new weights for the Priority Student Group portion of the Academic Achievement calculation should more clearly communicate the current status of schools' improvement or decline in relation to state expectations of proficiency. However, after reading the documents it remains unclear why subgroups have different targets. If one subgroup target is lower than another, does it suggest that one subgroup is less capable?
2. It remains to be seen if moving to a higher N size will result in identifying more subgroups or schools for accountability. Going forward, it will be important to monitor how raising the N-size to 25 for the A-F calculations and leaving the N-size at 10 for Oklahoma School Testing Program reporting impacts usability and comparability of the data.
3. As I have shared with you in the past, I must caution that allocations of school-improvement funding (Title I Part A 7% set-aside) as a formula amount and in new competitive grants does little to help the growing number of low-achieving students the state has now.
  - The Comprehensive Support and Improvement Schools (CSI) list includes less than 100 of the lowest-performing schools statewide. CSI schools have received share of more than \$11 million in federal funds annually since 2018. Presumably, they will continue to do so until the next designations in 2022. The amendment indicates the "OSDE will re-evaluate the designation cycle at the end of 2024-2025, using 2023-2024 data to ensure the individual needs of the schools are being met." Can this not be determined now from 2017, 2018 and 2019 data?
  - The amount of funding is less a concern than it being concentrated in too few schools. Providing "support" without investment to about 150 Additional Targeted Support and Improvement schools and an unknown number of Targeted Support and Improvement sites statewide makes these schools more likely to fall into the bottom 5% of schools. As such, they would be designated as CSI within the next three years. More schools need focused, data-driven help to improve. Though the OSDE's School Support and Improvement team is being expanded, it will be difficult to serve hundreds of more schools.



- Moreover, how is the OSDE evaluating the results from the first three years of allocations? Will you determine and share best practices learned from CSI schools, especially those receiving Oklahoma Edge and Focused Edge competitive grants?
- 4. In understanding that the scaled proficiency score is not new, it is still important to recognize that a scaled score is a moving target. Historically, a criterion referenced test is designed to set attainable proficiency goals that all students can work towards, because all students can grow and all students can improve.

With respect for the complexity of the work represented here and as CEO of Alpha Plus Educational Systems working with schools statewide, I stand committed to helping Oklahoma become a top-ten state in education. Let me know how we can help.

Sincerely,

Jan Barrick

Cc: Honorable Members, House and Senate Education Committees  
Emailed to Office of Accountability, [accountability@sde.ok.gov](mailto:accountability@sde.ok.gov)

JB/wsp